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March 14, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. James R. Cho, U.S.M.J.
225 Cadman Plaza East
Courtroom 11D South
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, et al.
Case No.: 1:22-cv-1032 (PKC) (JRC)

Dear Judge Cho:

This office, along with Sage Legal LLC, represents the Plaintiff IME WatchDog, Inc. ("Plaintiff") in the above-referenced case.

On February 27, 2025, Plaintiff informed the Court that, on February 27, 2025, it re-served the subpoenas on the non-party observers, Christian Hogarth, Fari Gutierrez, Lizbeth Medina, Mark Purficati, and Sara Gonzalez and filed declarations of service. To date, none of the non-party observers have complied with the subpoenas. Accordingly, Plaintiff respectfully requests that pursuant to 28 U.S.C. § 636(e), the Court certify to Judge Chen the facts surrounding the contempt by non-party observers, Christian Hogarth, Fari Gutierrez, Lizbeth Medina, Mark Purficati, and Sara Gonzalez.

Dated: Lake Success, New York

March 14, 2025

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen, Esq.

Dated: Jamaica, New York

March 14, 2025

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.

cc: All Counsel of Record (via ECF)